

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications and Energy on its own Motion into the Appropriate Pricing, based upon Total Element Long-Run Incremental Costs, for Unbundled Network Elements and Combinations of Unbundled Network Elements, and the Appropriate Avoided Cost Discount for Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the Commonwealth of Massachusetts

D.T.E. 01-20

**AT&T'S TWENTY-THIRD SET OF INFORMATION  
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. hereby submits to Verizon the following information requests. Please provide responses to these requests as they are completed.

Instructions

Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.

Please provide answers as they are completed.

These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.

If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.

If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.

If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations

## INFORMATION REQUESTS

ATT-VZ 23-1. Referring to the Proprietary Attachment to Verizon's response to ATT-VZ 4-35:

(a) Please define the terms "Primary Discount Rate," "Secondary Discount Rate" (including an explanation of the difference between the two secondary discount rates shown), "Base Discount," and "Application Discount (including an explanation of the difference between the two application discounts shown).

(b) For each of the four terms set forth in paragraph (a) above, please explain precisely how each discount or discount rate is applied to derive the net price, and include sample calculations for each.

ATT-VZ 23-2. Please explain and reconcile the following apparent discrepancies between data contained in Verizon-MA's FCC Report 43-02 for the calendar year 2000 that was provided by Verizon in response to ATT-VZ 1-1 on the one hand, and Verizon's responses to ATT-VZ 14-9 and ATT-VZ 21-8 on the other:

(a) Verizon-MA reported to the FCC retirements for Digital Switching of \$74.5 million during CY 2000 (see FCC Report 43-02 for 2000, Table B-1, account 2212, retirements column), but in its response to ATT-VZ 14-9 Verizon reports retirements for Digital Switching of \$62 million for the same period;

(b) Verizon-MA reported to the FCC additions for Digital Switching of \$3.9 million during CY 2000 (see FCC Report 43-02 for 2000, Table B-1, account 2212, additions column), but in its response to ATT-VZ 21-8 Verizon reports additions for Digital Switching of \$174.0 million for the same period; and

(c) Verizon-MA reported to the FCC additions for Circuit Equipment of \$50.8 million during CY 2000 (see FCC Report 43-02 for 2000, Table B-1, account 2232, additions column), but in its response to ATT-VZ 21-8 Verizon reports additions for Circuit Equipment of \$342.5 million for the same period;

Respectfully submitted,

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